

November 8, 2010

Marlene Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554



Re: Notice of *Ex Parte* Presentation
MM Docket No. 99-25 (Creation of Low Power Radio Service)

Dear Ms. Dortch:

On Friday, November 5, 2010, Pete Tridish, Brandy Doyle and Katie Ingersoll, representing Prometheus Radio Project ("Prometheus"), had a brief telephone conversation with Dave Grimaldi, Chief of Staff and Media Legal Advisor to Commissioner Mignon Clyburn, to discuss matters in the above-captioned docket.

During the this telephone conference, the Prometheus participants discussed the revised version of the Memorandum of Agreement Regarding LPFM/FM Translator Priorities (the "MOA") between Prometheus and Educational Media Foundation, filed in the docket on September 22, 2010. The Prometheus participants also discussed a new supplementary study prepared by the advocacy organization Common Frequency, which is summarized in the accompanying attachment. The full study will be filed in this docket by Common Frequency when complete.

The Prometheus participants explained that this latest Common Frequency study suggests the detrimental impact on LPFM opportunities in most metropolitan areas that could be expected under the previously proposed ten-application cap and parameters for processing Auction 83 translator applications. That cap also could result unintentionally in rural populations and other underserved areas not receiving radio service if and when translator applicants chose to forgo protection of applications in such areas.

We submit this letter to the Secretary's office pursuant to 47 C.F.R. § 1.1206(b). Please contact the undersigned should you have any questions regarding this submission.

Respectfully submitted,

/s/ Matthew F. Wood

Matthew F. Wood
Media Access Project
Counsel to Prometheus Radio Project

cc: Dave Grimaldi